

السيد والنائبين

UNITED STATES DISTRICT COURT

for the

WESTERN District of MISSOURI

Division

Case No.

(to be filled in by the Clerk's Office)

(JURY TRIAL DEMANDED)

REGINALD BYRON CLEMONS

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

TREVOR FOLEY, Director of MDOC

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

COMPLAINT FOR VIOLATION OF CIVIL RIGHTS

(Prisoner Complaint)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Except as noted in this form, plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed in forma pauperis.

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name REGINALD BYRON CLEMONS
 All other names by which
 you have been known: _____
 ID Number _____
 Current Institution Jefferson City Correctional Center
 Address 8200 Fence Line Road
Jefferson City MO 65101
City State Zip Code

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. Make sure that the defendant(s) listed below are identical to those contained in the above caption. For an individual defendant, include the person's job or title (*if known*) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name TREVOR FOLEY
 Job or Title (*if known*) Director of The Missouri Department of Corrections
 Shield Number N/A (unknown)
 Employer The State of Missouri Department of Corrections
 Address 2729 Plaza Drive
Jefferson City Missouri 65109
City State Zip Code
☒ Individual capacity ☒ Official capacity

Defendant No. 2

Name KELLY MORRIS
 Job or Title (*if known*) Warden of Missouri Department of Corrections
 Shield Number N/A (unknown)
 Employer The State of Missouri Department of Corrections
 Address 8200 Fence Line Road
Jefferson City Missouri 65101
City State Zip Code
☒ Individual capacity ☒ Official capacity

Defendant No. 3

Name

CRAIG HARTLEY,

Job or Title (if known)

LIBRARIAN

Shield Number

Employer

EASTERN RECEPTION DIAGNOSTIC CORR. CNTR.

Address

2722 Highway K

BOONE TERRE

City

MO

State

63628

Zip Code



Individual capacity



Official capacity

Defendant No. 4

Name

Job or Title (if known)

Shield Number

Employer

Address

City

State

Zip Code



Individual capacity



Official capacity

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (check all that apply):

Federal officials (a *Bivens* claim)

State or local officials (a § 1983 claim)

B. Section 1983 allows claims alleging the "deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws]." 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

My Fourth Amendment liberty interest right to intellectual property protection and to have a non profit legal fund bank account,
My 13th Amendment right not to be a slave and liberty interest to know the amount of my debt, Fourteenth Amendment liberty interest to equal protection under the law.

C. Plaintiffs suing under *Bivens* may only recover for the violation of certain constitutional rights. If you are suing under *Bivens*, what constitutional right(s) do you claim is/are being violated by federal officials?

- I have a liberty interest not to be a slave or treated as property like a slave sub human, under the 13th Amendment.*
- D. Section 1983 allows defendants to be found liable only when they have acted "under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia." 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

The Director fails or refuses to provide means and adequate access to intellectual property rights or protections against economic conditions of slavery, Director Trevor Foley is violating the 4th, 13th and 14th Amendment in attached documents.

III. Prisoner Status

Indicate whether you are a prisoner or other confined person as follows (check all that apply):

- ☐ Pretrial detainee
- ☐ Civilly committed detainee
- ☐ Immigration detainee
- ☒ Convicted and sentenced state prisoner
- ☐ Convicted and sentenced federal prisoner
- ☐ Other (explain) _____

IV. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. If the events giving rise to your claim arose outside an institution, describe where and when they arose.

Please see Attached Pages

- B. If the events giving rise to your claim arose in an institution, describe where and when they arose.

Please see Attached Pages

- C. What date and approximate time did the events giving rise to your claim(s) occur? I started researching and developing through prayer and supplication for a new ecologically balanced commodity value evaluation system in April of 2008. Arriving at the calorie as the primary organic consumption value of measure, I prayed and was granted the 2000.08 calorie value being compatible with time. The Missouri Department of Corrections have continuously denied me intellectual property rights.
- D. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?) I have been told in writing by the Missouri Department of Corrections I don't have the right to conduct business, enter into contract, obtain intellectual property rights, have a bank account outside the Missouri Department of Corrections Banking system, I am not allowed to pursue freedom from slavery by the establishment of the AFRICAN AMERICAN TRUST FUND and Nationhood under the NEW AFRICAN AMERICAN FLAG; because the Missouri Department of Corrections policy creates no liberty interest protection under the United States Constitution, in effect causing me to be as civilly dead as a slave.

V. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive. I am being legally hindered from accessing the judicial processes of the U.S. Department of Commerce Department of U.S. Patents And Trade Marks Office, to obtain intellectual property rights for a new currency and calorie of organic value evaluation system I call the Average Income Percentage Coin as a digital currency, that is valued at 92.5¢ on the U.S. Dollar \$1.00 multiplied by (2000.08 x 80 billion) to represent the global caloric needs of the human population, totalling over \$14 trillion Dollars U.S..

VI. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

Order the defendants to pay attorney fees and court cost,
Order the defendants to provide me access to computer training equal to that provided to all other prisoners trained in computer coding
Order the defendants to allow me to establish the AFRICAN AMERICAN TRUST FUND BANKING SYSTEM Internationally and the right to secure the Average Income Percentage Coin as my intellectual property, to be traded as currency on the open market as a NOTE of currency and commodity.

VII. Exhaustion of Administrative Remedies Administrative Procedures

The Prison Litigation Reform Act ("PLRA"), 42 U.S.C. § 1997e(a), requires that "[n]o action shall be brought with respect to prison conditions under section 1983 of this title, or any other Federal law, by a prisoner confined in any jail, prison, or other correctional facility until such administrative remedies as are available are exhausted."

Administrative remedies are also known as grievance procedures. Your case may be dismissed if you have not exhausted your administrative remedies.

A. Did your claim(s) arise while you were confined in a jail, prison, or other correctional facility?

☒ Yes

☐ No

If yes, name the jail, prison, or other correctional facility where you were confined at the time of the events giving rise to your claim(s).

Potosi Correction Center
11543 State Highway O
Mineral Point, MO 63660

ERDEC
2727 Highway K
Bonne Terre, MO 63628

Jefferson City Corr. Cntr.
8200 Fence Line Road
Jefferson City, MO 65101

B. Does the jail, prison, or other correctional facility where your claim(s) arose have a grievance procedure?

☒ Yes

☐ No

☐ Do not know

C. Does the grievance procedure at the jail, prison, or other correctional facility where your claim(s) arose cover some or all of your claims?

☐ Yes

☒ No

☐ Do not know

If yes, which claim(s)?

I am filing this law suit in its entirety into the grievance procedure to ensure exhaustion of all claims, to be fully heard.

No, this complaint requires changes to policies and can not be resolved by grievance complaints in State Administrative Procedure.

- D. Did you file a grievance in the jail, prison, or other correctional facility where your claim(s) arose concerning the facts relating to this complaint?

☒ Yes

☐ No

If no, did you file a grievance about the events described in this complaint at any other jail, prison, or other correctional facility?

☐ Yes

☐ No

- E. If you did file a grievance:

1. Where did you file the grievance?

Eastern Reception Diagnostic Correctional Center
2727 Highway K
Bonne Terre, Missouri 63628

2. What did you claim in your grievance?

IRR/Grievance No. ERDCC-20-1508, I am being denied the liberty interest of intellectual property protection against UNCONSTITUTIONAL SEARCH AND SEIZURE, THEFT, AND TO BE FREE OF CONDITIONS OF SLAVERY or CIVIL DEATH and EQUAL PROTECTION UNDER THE LAWS OF THE UNITED STATES, to open an account to protect my legal rights to intellectual property protection.

3. What was the result, if any?

The Missouri Department of Corrections Denied my right to file for a patent or copyrights by making copies on the only copy machine accessible to me, under Department policy.

4. What steps, if any, did you take to appeal that decision? Is the grievance process completed? If not, explain why not. (Describe all efforts to appeal to the highest level of the grievance process.)

See Attached Exhausted Grievance

F. If you did not file a grievance:

1. If there are any reasons why you did not file a grievance, state them here:

N/A This complaint will be filed in its entirety as a grievance.

2. If you did not file a grievance but you did inform officials of your claim, state who you informed, when and how, and their response, if any:

The Missouri Department of Corrections pay me slave wages with no fixed debt limit to the time I must serve and considers me and treats me as a slave for profit with no means to pay for my freedom. This denies me access to a \$14 trillion dollar account with which to pay the debt I owe society.

G. Please set forth any additional information that is relevant to the exhaustion of your administrative remedies.

Please See Attached Documents

(Note: You may attach as exhibits to this complaint any documents related to the exhaustion of your administrative remedies.)

VIII. Previous Lawsuits

The "three strikes rule" bars a prisoner from bringing a civil action or an appeal in federal court without paying the filing fee if that prisoner has "on three or more prior occasions, while incarcerated or detained in any facility, brought an action or appeal in a court of the United States that was dismissed on the grounds that it is frivolous, malicious, or fails to state a claim upon which relief may be granted, unless the prisoner is under imminent danger of serious physical injury." 28 U.S.C. § 1915(g).

To the best of your knowledge, have you had a case dismissed based on this "three strikes rule"?

☐ Yes

☒ No

If yes, state which court dismissed your case, when this occurred, and attach a copy of the order if possible.

N/A

- A. Have you filed other lawsuits in state or federal court dealing with the same facts involved in this action?

☐ Yes

☒ No

- B. If your answer to A is yes, describe each lawsuit by answering questions 1 through 7 below. *(If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)*

1. Parties to the previous lawsuit

Plaintiff(s) N/A

Defendant(s) _____

2. Court *(if federal court, name the district; if state court, name the county and State)*

N/A

3. Docket or index number

N/A

4. Name of Judge assigned to your case

N/A

5. Approximate date of filing lawsuit

N/A

6. Is the case still pending?

☐ Yes

☒ No

If no, give the approximate date of disposition.

N/A

7. What was the result of the case? *(For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)*

N/A

- C. Have you filed other lawsuits in state or federal court otherwise relating to the conditions of your imprisonment?

☒ Yes☐ No

D. If your answer to C is yes, describe each lawsuit by answering questions 1 through 7 below. (If there is more than one lawsuit, describe the additional lawsuits on another page, using the same format.)

1. Parties to the previous lawsuit

Plaintiff(s) REGINALD BYRON CLEMONS

Defendant(s) MICHELLE BASHAM, et al.;

2. Court (if federal court, name the district; if state court, name the county and State)

UNITED STATES DISTRICT COURT, EASTERN DISTRICT OF
MISSOURI, St. Louis City Missouri, Federal District Court
Eastern Division

3. Docket or index number

No. 4:22-cv-00158

4. Name of Judge assigned to your case

Honorable Judge Stephen R. Welby

5. Approximate date of filing lawsuit

January 28, 2022; Amended October 11, 2022; 2nd Amendment March 2,
2023

6. Is the case still pending?

☒ Yes

☐ No

If no, give the approximate date of disposition

N/A

7. What was the result of the case? (For example: Was the case dismissed? Was judgment entered in your favor? Was the case appealed?)

Still Pending Outcome

I declare under penalty of perjury that the foregoing is true and correct.

Executed (signed) this 11th day of JUNE 2025.

Reginald Clemons
Signature(s) of Plaintiff(s)
Reginald Clemons, pro se

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This mail is from an offender in the custody
of the MO Department of Corrections

Reginald BYRON CLEMONS 990102-13D-205
JEFFERSON CITY CORRECTIONAL CENTER
8200 Fence Line Road
Jefferson City, Missouri 65101

U.S. District Court
Office of the Clerk
1510 Whitaker Courthouse
400 E. Ninth Street
Kansas City, MO 64106

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